

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BLACK & DECKER INC. and BLACK &
DECKER (U.S.) INC.,

Plaintiffs,

v.

TECHTRONIC INDUSTRIES CO. LTD.,
ONE WORLD TECHNOLOGIES, INC.
and OWT INDUSTRIES, INC.

Defendants.

C. A. No. 1:06-cv-00386-(GMS)

JURY TRIAL DEMANDED

**DECLARATION OF WILLIAM MCLAY IN SUPPORT OF
DEFENDANTS' MOTION TO SEVER AND
TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, William McLay, declare under the penalty of perjury as follows:

1. I am the Senior Vice President, Design & Development for Defendants' Techtronic Industries Co. Ltd. ("Techtronic"), One World Technologies, Inc. and OWT Industries, Inc. I have personal knowledge of the facts stated in this declaration, and if called upon, could testify thereto.

2. One World Technologies, Inc. OWT Industries, Inc. and Milwaukee Electric Tool Corporation are wholly owned subsidiaries of Techtronic.

3. Techtronic, One World, OWT and Milwaukee Electric Tool occasionally share certain product designs when designing new products. With respect to RIDGID brand products with Model Nos. R2930 and R2900, Techtronic used the designs of Milwaukee Electric Tool for the parts related to the tool bit mounting system. Accordingly, the tool bit mounting system in the RIDGID products identified above are

substantially similar, and in some respects identical to, the tool bit mounting system used in the Milwaukee Electric Tool router products.

4. Milwaukee Electric Tool developed the plans for the tool bit mounting system used on the above models at its headquarters in Brookfield, Wisconsin.

5. Neither the RIDGID routers nor the Milwaukee Electric Tool routers were designed or manufactured in or near Delaware.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge:

Signed: 

William McLay

Dated: 8/28/06

Location: 1428 Pearman Dairy Rd
Anderson, SC 29625

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2006, I electronically filed the foregoing document, **DECLARATION OF WILLIAM MCLAY IN SUPPORT OF DEFENDANTS' MOTION TO SEVER AND TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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Additionally, I hereby certify that on this 28th day of August, 2006, the foregoing document was served via Federal Express and by e-mail on the following non-registered participants:

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